

AO 91 (Rev. 11/11) Criminal Complaint

# UNITED STATES DISTRICT COURT

for the

Northern District of Indiana

**-FILED-**

MAY 2 2023

At \_\_\_\_\_ M  
Chanda J. Berta, Acting Clerk  
U.S. DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA

United States of America

v.

RYAN A. STEELE

Case No.

1:23-mj-56

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Between 3/9/23-3/26/23 & 4/22/23 in the county of Allen in the  
Northern District of Indiana, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 2423(a)

18 U.S.C. § 2252A(a)(5)(B)

Between on or about 3/9/23, and on or about 3/26/23, defendant did knowingly attempt to transport a minor in interstate or foreign commerce with the intent that the minor engage in prostitution or in any sexual activity for which a person can be charged with a criminal offense, to wit: attempted sexual misconduct with a minor under Indiana Code 35-42-4-9, in violation of 18 U.S.C. § 2423(a); and on or about 4/22/23, defendant did knowingly possess, or knowingly access with intent to view, any book, magazine, periodical, film, videotape, computer disk, or any other material that contains an image of child pornography that has been mailed, or shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including by computer, or that was produced using materials that have been mailed, or shipped or transported in or affecting interstate or foreign commerce by any means, including by computer, in violation of 18 U.S.C. § 2252A(a)(5)(B).

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

☒ Continued on the attached sheet.

**ANTHONY G AGULAR** Digitally signed by  
ANTHONY G AGULAR Date: 2023.05.02  
11:46:33 -04'00'

Complainant's signature

HSI SA Anthony Agular

Printed name and title

Sworn to before me and signed in my presence.

Date: 05/02/2023

City and state: Fort Wayne, IN

s/ Susan Collins

Judge's signature

Susan Collins, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT**

Your affiant, Anthony Agular, a Special Agent with the U.S. Department of Homeland Security (DHS), Homeland Security Investigations (HSI), being first duly sworn, hereby depose and state as follows:

I am a federal law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code, and am empowered to investigate and make arrests for violations of U.S. criminal laws, including but not limited to persons who persuade, induce, entice, or coerce minor to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense in violation of 18 U.S.C § 2422 ; and for violating 18 U.S.C. § 2252A(a)(5)(B) and (b)(2), Possession of, knowing access, conspiracy to access, or attempted access with intent to view child pornography.

I have been a Special Agent for over 6 years and have over 14 years of law enforcement experience. I am currently assigned to the HSI Office of the Special Agent in Charge (SAC) Chicago, Fort Wayne, Indiana post of duty, which is responsible for conducting criminal investigations and enforcing laws that are under the investigative jurisdiction of HSI in the Northern District of Indiana. As part of my duties as an HSI Special Agent, I investigate criminal violations, and have investigated and or participated in many cases involving

child pornography and the sexual exploitation of children. During these investigations, I have observed and reviewed examples of child pornography in various forms of media. I have received training and instruction in the field of investigation and enforcement of federal child pornography laws. I have also participated in investigations involving various violations of federal laws. Through these investigations, my training and experience, and conversations with other agents and law enforcement personnel, I have become familiar with the methods used by individuals to commit violations of federal law. I have previously been the affiant for federal search warrants and have assisted other state and local agencies, as well as Assistant United States Attorneys, in the preparation of affidavits for search and arrest warrants.

### **REQUESTED WARRANT**

Your affiant requests this Court issue a warrant for the arrest of **RYAN A. STEELE (STEELE)** for alleged violations of 18 U.S.C. §2423(a) related to the attempted transportation of a minor, and 18 U.S.C. §2252A(a)(5)(B) related to the possession of child pornography.

Because this affidavit is being submitted for the limited purpose of securing an arrest warrant for **STEELE**, your affiant has not included each and every fact known concerning this investigation. This affidavit sets forth only those facts necessary to establish probable cause.



### RELEVANT DEFINITIONS

- “Minor” means any person under the age of eighteen years.

18 U.S.C. § 2256(1).

- “Child pornography” means as any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where:
  - the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct;
  - such visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaging in sexually explicit conduct;
  - or such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct.”

18 U.S.C. § 2256(8)(A)-(C).

- The term “sexually explicit conduct” means:
  - graphic sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex, or lascivious simulated sexual intercourse where the genitals, breast, or pubic area of any person is exhibited;
  - graphic or lascivious simulated;
    - bestiality;
    - masturbation; or
    - sadistic or masochistic abuse; or
  - graphic or simulated lascivious exhibition of the anus, genitals, or pubic area of any person.

18 U.S.C. § 2256(2)(B)(i)-(iii).

**PROBABLE CAUSE**

On or about March 31, 2023, your affiant received an investigative referral from the La Porte Police Department (LPD) in La Porte, Texas relating to **STEELE**. LPD advised your affiant that **STEELE** has used cellular number (260) 466-2929 as well as various social media accounts between January 2023 and March 2023, to persuade, induce, or entice a 15 year old minor female (minor female) to engage in sexual activity including intercourse with him. Your affiant was advised that on or about March 26, 2023, **STEELE** travelled from Indiana to an address in La Porte, Texas with the intent of taking the minor female from LaPorte, Texas to Indiana to live with him and to engage in sexual activity, including sexual intercourse with him.

Your affiant has reviewed Instagram text conversations between **STEELE** and the minor female. In those text conversations, **STEELE** expressed a sexual interest in the minor female. **STEELE** also engaged in sexually explicit conversations with the minor female and discussed traveling from Indiana to Texas to pick up the minor female and bring her back to Indiana to live with and engage in sexual activity with him. During the Instagram text conversations, **STEELE** coordinated his travel to Texas and discussed what he intended to do with the minor female sexually once she got back to Indiana with him. The Instagram text conversations revealed that **STEELE** intended to travel from Indiana to Texas in late March 2023.

**STEELE** had also learned from the minor female that during that time she would be staying at her grandparents' house in LaPorte, Texas.

On March 26, 2023, a video security camera installed at the home of the minor female's grandparents captured a white Ford Edge SUV (the vehicle) parked on the street just west of the grandparents' residence. Law enforcement later spoke with the minor female's grandfather(grandfather) who advised that he saw an individual, later identified as **STEELE**, sitting alone in the vehicle. The grandfather further advised that **STEELE** got out of the vehicle, approached him and asked for the minor female by name. The video surveillance also captured **STEELE** telling the grandfather that he knew the minor female from her job at the mall and that he helped the minor female with a neighbor. **STEELE** left when he discovered that the minor female was not at the grandparents' residence. This was also captured on the grandparents' video surveillance.

LPD investigators reviewed their "FLOCK"<sup>1</sup> camera system video. A query of that camera system by LPD for vehicles with Indiana license plates

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<sup>1</sup> Flock Safety is an American company that sells Automated License Plate Recognition technology (ALPR) to law enforcement agencies and neighborhood associations. The cameras read license plates and sent instant alerts to law enforcement officers when the cameras identify license plates that match those on lists of cars that are stolen or otherwise of interest to the police. Private citizens and businesses who own one of Flock's cameras can use their own hot lists. Unlike many other ALPR systems, Flock cameras also allow searches based on the car's color and various other visual features.



revealed a white Ford Edge SUV displaying an Indiana State license plate with characters "AWJ183" (**SUBJECT VEHICLE**). The information obtained via the FLOCK system, and reviewed by your affiant, revealed a total of 35 matches for Indiana license plate "AWJ183" between March 24, 2023, and March 27, 2023. One of those instances was on March 26, 2023, at approximately 10:17am when the vehicle was seen on a FLOCK camera located on Underwood Road and leased by the City of La Porte, Texas. Your affiant has learned that Underwood Road is within three miles of the grandparents' residence. A law enforcement database query of Indiana license plate number AWJ183 showed that this license plate was associated with a Ford Fusion that was registered to the **STEELE**. Specifically, the query noted that the license plate on the vehicle was registered to a 2012 Ford Fusion at residential address on Sheridan Road in Fort Wayne, Indiana. The white Ford Edge identified on the FLOCK camera system with the Indiana license plate AWJ183 that was registered to **STEELE** was identical to the vehicle captured on the surveillance video at the home of the minor female's grandparents on March 26, 2023. This places the **STEELE** in the vicinity of the grandparent's residence on the date the video surveillance showed that the **STEELE** approached the minor female's grandfather.

On or about March 28, 2023, LPD investigators conducted a video recorded interview of the minor female with her mother present at the LPD

office. During the interview, investigators learned that the minor female knew **STEELE** as "Ryan Steele" and that she had been engaged in ongoing communications with **STEELE** over several different social media applications including, but not limited to, "Discord", "Instagram" and by standard SMS text messages. The minor female said that **STEELE** had been communicating with her online for approximately 5 years which made her approximately ten years old at the time she and **STEELE** began communicating. The minor female also said that **STEELE** knew that she was under 18 years old, and that he initially identified himself as being 30 years old.

During the interview, the minor female also said that within the previous two months, the communications with **STEELE** had turned sexual in nature. **STEELE** also made several comments to her about traveling to Texas from Indiana to pick up her up and bring her to Indiana where the two of them would live together and engage in sexual intercourse and other sexual activity. The minor female said that **STEELE** told her he worked as an aide providing health and wellness services to elderly people. The minor female also confirmed to investigators that all recent communications between **STEELE** and her were done using Instagram instant messaging and SMS text messages. The minor female went on to identify **STEELE'S** cellular telephone number as (260) XXX-2929. The minor female then identified **STEELE** as the



individual depicted in a still image made from her grandparents' video surveillance cameras on March 26, 2023. The minor female also identified **STEELE** as the person who communicated with her that he wanted to have sexual intercourse with her when they met in person.

Open-source data base queries of cellular number (260) XXX-2929 showed the number to be registered to AT&T Cellular and assigned to customer "Ryan Alexander Steele", a male, with a date of birth of XX/XX/1998. On or about March 31, 2023, LPD investigators obtained a search warrant from a LaPorte Municipal Court Judge to seize and then forensically search the minor female's personal cellular telephone. On that same date, data extracted from the minor female's cellular showed screen captures of a portion of the Instagram messages sent by the **STEELE** to the minor female. The captured messages corroborated information obtained from the minor female regarding **STEELE'S** intent to travel to Texas and engage in sexual intercourse with the minor female. Further review by law enforcement personnel, to include a subsequent review by your affiant, also revealed that **STEELE** had been making arrangements to travel from Indiana to Texas on or about March 24, 2023, to pick up the minor female and take her back to Indiana to live with him at his house located on Williams Street in Kendallville, Indiana. Furthermore, messages from **STEELE** to the minor female in the weeks leading up to March 24, 2023, clearly evidence **STEELE'S** anticipation and

excitement at the upcoming trip to Texas to pick up the minor female. The messages go so far as to show **STEELE** counting down the days until his trip to Texas to meet with the minor female.

On March 31, 2023, your affiant was provided information from the LPD pertaining to the **STEELE**'s Instagram user account, identified with Instagram User ID number 5927672691 and Instagram username "revenantgamer98." The minor female also identified this as the Instagram account belonging to **STEELE** with whom she had been communicating for the past approximately five years. Between April 4, 2023 and April 10, 2023, affiant was provided supporting documentation from the LPD relating to **STEELE** and the events surrounding his travel to Texas on approximately March 24, 2023. Those materials included the video surveillance footage from the grandparents' residence that captured images of **STEELE** and a profile of the white colored Ford Edge SUV driven by the **STEELE**. Additionally, affiant received extracted data from the minor female's cellular telephone. That data included samples of captured messages in which **STEELE** communicated with the minor female on Instagram. Your affiant reviewed representative samples of the captured conversation(s) between **STEELE** and the minor female between March 9, 2023, and March 26, 2023. During this period, **STEELE** engaged in conversation with the minor female. Affiant reviewed the following captured conversations that happened on or about March 10, 2023. Affiant was

able to determine by date, time and by the partial content captured from the screen captures that the messages below were sent by **STEELE** to the minor female from the Instagram account identified during the investigation as belonging to the **STEELE**:

- *March 9, 2023: 2:39 am – “Okay so we both get paid in 2 weeks so that would be the best time, damn you got me turned on and hard”*
- *March 9, 2023: 3:06 am – “We may actually have to get our own place, I think we made disturb the other person with all the noise we’re going to make.”*
- *March 9, 2023 – 3:07 am – “On the table, against the wall, on the couch, in the shower, in bed of course, shit probably just on the floor too”*
- *March 10, 2023: 9:22 am – “So I got a couple questions you can answer them whenever. When you move in do you want your own room or do you want my room to become our room? Should we get “toys” to use? Simple questions like that.”*
- *March 11, 2023: 10:31 pm – “Question, are you gonna bring birth control with you, or should we buy some later, or should I just bring condoms?”*
- *March 13, 2023: 9:51 pm – “We’re all set for the move except what day and time to pick you up on.”*
- *March 17, 2023: 9:58 pm – “Just 7 more days, God time can not move fast enough.”*



- *March 17, 2023: 11:09 pm – “I got you a dildo that you can either use when I’m busy or am currently recharging, a bullet vibe to tease in places, a ring to keep hard a little while longer, butt plug that I don’t think we’ll actually use unless we’re trying new things but not anytime...”*
- *March 22, 2023: 9:21 am – “Hey Katt I’m curious have you told anybody about us or the plan?”*
- *March 23, 2023: 11:29 am – “So what I’ll probably do is I’ll head to your town tomorrow and then Saturday you can just hmu with where.”*
- *March 23, 2023: 11:37 am – “Don’t have to worry too much about cameras as we’ll cover our faces and my car will have a dead license plate that isn’t linked to anyone so can’t be tracked that way.”*
- *March 23, 2023: 3:06 pm – “I’m stopping on my way home to get a pack of rubbers and then I’ll be heading home too.”*
- *March 23, 2023: 3:20 pm – “I think 46 rubbers are enough for a bit.”*
- *March 24, 2023: 7:57 am – “I just stopped to gas up for the first time but I’m getting back on the road and I’m on my way”*
- *March 24, 2023: 2:09 pm – “About halfway there so only another 9ish hours before I’m in town”*
- *March 26, 2023: 6:00 pm – “We’ll have to try again in another week or 2 I guess...”*
- *March 26, 2023: 6:00 pm - “I can’t believe I was down there for 3ish days and we didn’t even get to see each other”*
- *March 26, 2023: 6:38 pm – “About half way home”*
- *March 26, 2023: 6:51 pm – “So just to be clear I’m going to the right place there’s a school that is 4 minutes away from the Roseberry address right?”*

During a review of the captured messages in conjunction with the interview of the minor victim, it was revealed that **STEELE** communicated traveling from Indiana to Texas for the purposes of transporting the minor female from Texas to Indiana to live with him and engage in sexual intercourse and other sexual activity. Further review of the captured content revealed **STEELE** intended to use various methods to disguise the vehicle from detection. **STEELE** also planned to use various methods to disguise the appearance of the identity of the minor victim. Affiant also reviewed many of the images and videos in the photo library cache of the minor female's cellular telephone. These images and videos included images of the minor female's bare breasts and fully exposed vagina. Affiant also noticed from these screen captures that some of the images and videos of the minor female's breasts and vagina appeared to have been sent to **STEELE**.

On or about March 31, 2023, an administrative subpoena was issued to AT&T requesting subscriber information for cellular number (260) XXX-2929. On or about April 1, 2023, AT&T responded to that administrative subpoena with the following summarized information for the cellular number (260) XXX-2929 between November 30, 2022, and March 30, 2023:

Subscriber Name:	RYAN STEELE
Service Start Date:	XX/XX/2018
MSISDN:	(260) XXX-2929
IMSI:	310410293186502
Email:	RYAN.STEELE98@YAHOO.COM
User Address:	XXXX SHERIDAN RD LOT XX, FORT WAYNE, IN 46803

On or about April 3, 2023, an administrative subpoena was issued to Meta Platforms requesting subscriber information for Instagram user ID # 5927672691, associated to username “revenantgamer98”. On or about April 3, 2023, Meta Platforms responded to the administrative subpoena with the following summarized information associated to the Instagram user “revenantgamer98”.

Subscriber Name:	Ryan Steele
Vanity Name:	revenantgamer98
Registration Date:	2017-08-24 01:15:25 UTC
Email:	raginggamer98@yahoo.com
Registration IP:	73.58.158.130

On April 21, 2023, affiant obtained search warrants for **STEELE’S** person, his Kendallville residence, and the vehicle from the U.S. Magistrate Judge in Fort Wayne. Those search warrants were executed on April 22, 2023. Prior to the execution of those search warrants, affiant and local law enforcement observed **STEELE** leaving the Williams Street address and get into the vehicle. Affiant and local law enforcement executed made contact with **STEELE** as he was in the vehicle. At that time, **STEELE** was found to be in



possession of an LG mobile device with the username "RevenantGamer" visible on the screen. The cellphone, was later identified as having cellular number (260) XXX-2929 which was the same number used to communicate with the minor female. The mobile device also had the same colored phone case seen on the grandparents' surveillance camera. Additionally, affiant observed a black and blue neck gator inside the vehicle, matching the one worn by **STEELE** on March 26, 2023, while at the minor female's grandparents residence.

During a post-Miranda recorded interview, **STEELE** admitted to having communicated with the minor female for the past approximately five years, and to know that she was a minor. **STEELE** admitted that he and the minor female communicated using various social media and messaging applications, to include Discord, Instagram, and SMS messaging. **STEELE** also acknowledged that his communications with the minor female began when she was approximately 11 years old. **STEELE** said that he felt that he was more of a trusted person in whom the minor female could confide. **STEELE** went on to identify "revenantgamer98" as his Instagram username and said that he primarily used Instagram on his cellular telephone to communicate with the minor female. **STEELE** admitted to travelling from Indiana to La Porte, Texas, with the intent to transport the minor female to Indiana to live with him and engage in sexual activity together. **STEELE** also admitted that

communicated his intentions to the minor female. Additionally, **STEELE** admitted that he tried to evade law enforcement by using a license plate he believed could not be traced to him. **STEELE** admitted to engaging in sexual conversations with the minor female and to having sent the minor female a picture of his penis. **STEELE** also said that the minor female sent him nude images and videos of herself. **STEELE** said that he screen captured the nude images and videos and saved them to his cellular telephone to use later for masturbation.

On the same date, during an initial analysis of the LG mobile cellphone recovered from **STEELE'S** person, affiant observed multiple images of the minor female, to include nude images of the minor female's vagina, bare breasts, as well as a video of the minor female touching her vagina with her fingers. **STEELE** identified the images and videos as being those of the minor female. **STEELE** admitted to knowing that the images and videos of the minor female on his cellular telephone were child pornography and that he stored the images and videos in a password protected file on his cellphone for protection. **STEELE** went on to identify captured conversation(s) on his device as ones that occurred between himself and the minor female between March 9, 2023 and March 26, 2023. The captured Instagram conversations, identified by **STEELE** with his username "revenantgamer98", were the same conversations detailed above that had been captured on the minor female's cellular telephone

and reviewed by your affiant.

### CONCLUSION

Based on the above information, affiant has probable cause to believe that:

- Between on or about March 9, 2023, and on or about March 26, 2023, **STEELE** did knowingly attempt to transport a minor in interstate or foreign commerce with the intent that the minor engage in prostitution or in any sexual activity for which a person can be charged with a criminal offense, to wit: attempted sexual misconduct with a minor under Indiana Code 42-4-9, in violation of 18 U.S.C. §2423(a);
- On or about April 22, 2023, **STEELE** did knowingly possess, or knowingly access with intent to view, any book, magazine, periodical, film, videotape, computer disk, or any other material that contains an image of child pornography that has been mailed, or shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including by computer, or that was produced using materials that have been mailed, or shipped or transported in or affecting interstate or foreign commerce by any means, including by computer, in violation of 18 U.S.C. §2252A(a)(5)(B).

The foregoing facts are true to the best of your Affiant's knowledge and belief.



This complaint affidavit and arrest warrant are being considered and executed by reliable electronic means under Federal Rule of Criminal Procedure 4.1.

Further you affiant sayeth naught.

**ANTHONY**  
**AGULAR**

(Digitally signed by  
ANTHONY G AGULAR  
Date: 2023.05.02  
11:47:51 -04'00')

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Anthony Agular  
Special Agent  
Homeland Security Investigations

Subscribed and sworn before me this 2nd day of May 2023.

s/ Susan Collins

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Hon. Susan Collins  
U.S. Magistrate Judge  
Northern District of Indiana

